



Privacy & Cookie Notice

Phoenix Asset Management Partners Ltd. is
authorised and regulated by the Financial
Conduct Authority (FCA)

64–66 Glenthams Road
London SW13 9JJ

+44 (0) 208 600 0100
phoenix@pamp.co.uk

Privacy & Cookie Notice

Phoenix Asset Management Partners Limited ('PAMP') recognises the importance of protecting your personal information. This Privacy and Cookie Notice is designed to help you understand what data PAMP collects and what PAMP does with that data.

This Privacy and Cookie Notice covers our privacy and cookie standards and processes and where relevant, should be read in conjunction with our website terms and conditions or other legal documents.

For the purposes of the Data Protection Act 2018, the General Data Protection Regulation ((EU) 2016/679) ("GDPR") as well as all successor legislation to the Data Protection Act 2018 and the GDPR and the Privacy and Electronic Communications Directive (2002/58/EC) together with all implementing and successor legislation (collectively, the "Data Protection Legislation"), Phoenix Asset Management Partners Limited is the controller and is responsible for your personal data.

Personal data is any information related to a person that can be used to directly or indirectly identify the person. It can include, but is not limited to, a name, an email address, posts on social media, date of birth, an IP address, residential address, contact details, corporate contact information, signature, nationality, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to an investor's investment activity.

There are also "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

Processing of data relating to criminal convictions or offences is also subject to additional requirements and safeguards.

PAMP's data collection processes - investors

PAMP's core data processing activities involve the processing of:

- 1) Personal data of investors
- 2) Personal data of potential investors

The type of personal data we will collect will vary depending on what category you fall into above.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation. For instance, we may need to process and store more detailed information on our existing investors for legal reasons, such as having to obtain appropriate documentation to prove their identity i.e. through provision of a notarised passport or utility bill. For potential investors we will not require such a detailed level of data.
- (On exceptional occasions) where we have obtained your consent.
- (On rare occasions) where it is needed in the public interest.

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with your investment.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.



Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

We may only use information relating to **criminal convictions or offences** where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.

We will only collect information about criminal convictions if it is appropriate and where we are legally able to do so. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

We do not make decisions about you based on automated processing of your personal data.

The table below sets out the type of processing activity we carry out, the type of personal data that we collect, the categories of persons in respect of whom we collect such personal data, any third parties to whom such data is transferred and where they are based and the lawful basis on which we are seeking to rely in order to process such personal data.

In the table below, we consider 'basic details' to include personal data such as name, address, date of birth, telephone number and email address.

Category of processing	Category or person	Personal data	Third party to whom such data is transferred	Country where the data is stored	Lawful basis on which we are seeking to rely	Assessment/Purposes
Investor processing, registry maintenance and reporting for the Phoenix UK Fund	Investor	Basic details, identity documents, bank details	State Street	Globally	Legal obligation	The fund is legally required to collect, maintain and report on certain client information. It may also be required to report information to clients.
Investor processing, registry maintenance and reporting for the Huginn Fund	Investor	Basic details, identity documents, bank details	CIBC	Cayman, Bahamas, Barbados	Legal obligation	The fund is legally required to collect, maintain and report on certain client information. It may also be required to report information to clients.



Investor processing, registry maintenance and reporting for the Aurora Investment Trust	Investor	Basic details	Northern Trust Link Group Frostrow Capital	Globally	Legal obligation	The fund is legally required to collect, maintain and report on certain client information. It may also be required to report information to clients.
Investor processing, registry maintenance and reporting for the Castelnau Group	Investor	Basic details	Northern Trust Link Market Services	Globally	Legal obligation	The fund is legally required to collect, maintain and report on certain client information. It may also be required to report information to clients.
Investor tax reporting for the Phoenix UK Fund	Investor	Basic details, identity documents, bank details	Ernst & Young	Globally	Legal obligation	We are legally required to collect and report certain information on our investors.
Anti-money laundering checks for segregated account clients	Investor	Basic details and *special categories*	- and Acuris Risk Intelligence	UK	Legal obligation Special Categories: Suspicion of terrorist financing or money laundering	We are required under Anti Money Laundering regulations to collect certain information. We use Acuris to check the background of clients, it does not save any data to its servers.
Investor reports and accounts correspondence for segregated account clients	Investor	Basic details	-	UK	Legal obligation	We are legally required to provide information to investors on their investments.
Third party marketing process	Investor/ Potential investor	Basic details	Frostrow	UK	Legitimate interest	We use a third party to provide some marketing material to a limited selection of investors and potential investors.



Potential investor enquiries	Potential investor	Basic details, relevant employment information and/or, investment experience which demonstrates an understanding of complex investment products	Satuit	Canada	Legitimate interest	We will need to process personal data to contact potential investors with information about our firm and our products. We may need to request more information to ascertain if they are a professional client as required under Regulations.
Website account creation (where relevant)	Potential investor	Basic details, relevant employment and/or investment experience which demonstrates an understanding of complex investment products	Satuit	Canada	Performance of a contract	We will need to process personal data to enable investors to create a website account. Such personal data may be stored in a third party hosted database.
Website Reading room account creation (where relevant)	Investor/ Potential investor	email address	Sparks	Germany	Legitimate interest	We will need to process personal data to fulfil requests to receive reading room updates
Marketing	Potential investor	Basic details	Satuit	Canada	Legitimate interest	We will need to process personal data to contact potential investor with information about our firm and our products.



IT Services	Investor/ Potential investor	Basic details, relevant employment and/or investment experience which demonstrates an understanding of complex investment products, identity documents, bank details and potential criminal conviction information	Microsoft 365	Ireland, Netherlands, Austria, Finland	Legitimate interest Criminal conviction information: Suspicion of terrorist financing or money laundering	We use a third- party IT system within our business and therefore they will store personal data on our behalf.
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We may also receive personal information from third party sources, such as:

- entities in which you or someone connected to you has an interest;
- your legal and/or financial advisors;
- other financial institutions who hold and process your personal information; and
- credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements.

It should also be noted that telephone lines may be recorded for regulatory purposes and retained in a secure portal.

Sharing Your information with other companies

We may be required to share your personal data with third parties for the purposes set out in the table above.

We may also need to share your personal data with the following third parties for such purposes:

- Professional advisers including lawyers, bankers, auditors and insurers.
- Regulators and other authorities who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy and Cookie Notice.
- Fraud prevention agencies.
- Event organisation companies and venues for events.

We may use sub-processors of data to process your personal data on our behalf. We require all and any third parties to respect the security of your personal data and to treat it in accordance with the applicable law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Those third parties have no right to sell your personal data and PAMP will not sell your personal data.



International transfers

Many of our external third parties are based outside the UK.

Whenever we transfer your personal data out of the UK, we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection.

Please contact us at the contact details indicated below if you want further information.

Retention

We will only retain your personal information for as long as is necessary to carry out the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Your rights

The Data Protection Legislation provides the following rights for individuals:

1. The right to be informed

Individuals have the right to be informed about the collection and use of their personal data.

2. The right of access

Under the Data Protection Legislation, individuals have the right to obtain confirmation that their data is being processed and to access their personal data. This enables you to request to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it- a subject access request (SAR). We will respond to all SARs promptly and within 30 calendar days of receiving the request.

3. The right to rectification

The Data Protection Legislation includes a right for individuals to have inaccurate personal data rectified, or completed if it is incomplete, though we may need to verify the accuracy of the new data you provide to us.

4. The right to erasure

The right to erasure is also known as 'the right to be forgotten'. Individuals can make a request for erasure verbally or in writing. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

5. The right to restrict processing

Individuals have the right to request the restriction or suppression of their personal data (a) if they want us to establish the data's accuracy; (b) where our use of the data is unlawful but they do not want us to erase



it; (c) where they need us to hold the data even if we no longer require it as they need it to establish, exercise or defend legal claims; or (d) they have objected to our use of their data but we need to verify whether we have overriding legitimate grounds to use it.

6. The right to data portability

The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.

7. The right to object

Individuals have the right in certain circumstances to object to processing based on legitimate interests, the performance of a task in the public interest or the exercise of official authority. Individuals also have the absolute right to object to processing for direct marketing purposes (including profiling). Individuals also have a limited right to object to processing for purposes of scientific/historical research and statistical purposes.

8. Rights in relation to automated decision making and profiling

Individuals have the right not to be subject to automated decision-making, including profiling, which has legal or other significant effects on the individual. Not all the rights provided under the Data Protection Legislation are absolute, for example, if we are legally required to process your data, we may not be able to immediately delete it. If you have any questions or concerns about how we process your data please contact us on the details provided above.

9. Right to withdraw consent, if provided

If applicable, individuals have the right to withdraw their consent.

Cookies

Cookies are small files which are stored on a user's computer. When you visit a site for the first time, a cookie is downloaded onto your PC. When you subsequently visit the same site, the cookie will then 'remember' that you have visited the site before and may customise your experience appropriately.

If you are using a password-protected site, then cookies may be used as part of the authentication process.

PAMP's use of cookies

We may use cookies for the following purposes:

- Usage preferences - some cookies 'remember' the settings preferences of the user concerned or whether they have already seen a 'pop up' message in a previous session.

Where our use of cookies involves the processing of personal data, such personal data will be processed by us in accordance with this Privacy and Cookie Notice.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookies are essential in order for us to provide you with a service you have requested or to enable you to access and use our website.

You can restrict, block or delete the cookies which are set by any websites by changing your internet browser settings.



However, if you choose to disable cookies, some of PAMP's website functionality may be impaired. If you delete cookies relating to this website we will not remember things about you, including your cookie preferences, and you will be treated as a first-time visitor next time you visit the site. Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Compliance with laws

Your personal data will be held and processed by us in accordance with applicable data protection laws.

Other than already noted, we will not provide any personal data to any other persons, except if we are required to make disclosures by any law, any government or private parties in connection with a legal or regulatory request or similar proceeding

Your security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

However, the transmission of information via the internet is never completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

We recommend that you do not send us any personal data via non-secure methods of correspondence.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Changes to this privacy policy and your duty to inform us of changes

Any changes we make to our Privacy and Cookie Notice in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy and Cookie Notice.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the Privacy and Cookie Notice of every website you visit.



Contact

Questions, comments and requests regarding this Privacy and Cookie Notice are welcomed. Or, if you have any complaints relating to our Privacy and Cookie Notice or our use of your personal data, please contact us at Phoenix Asset Management Partners Limited, 64-66 Glenthams Road, London, SW13 9JJ, United Kingdom or by email to phoenix@pamp.co.uk.

You also have the right to make a complaint to your local supervisory authority. In the UK, the Information Commissioner's Office (ICO), is the supervisory authority for data protection issues. Further information can be found at www.ico.org.uk.

